

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Louis E. Gulley,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 17-cv-08209
)	
Dr. Jonathan Kelly,)	Honorable Edmond E. Chang
)	
Defendant.)	

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE
TO MOTION FOR SUMMARY JUDGMENT**

Plaintiff Louis E. Gulley, by his attorneys, respectfully moves for an extension of time to file his Response to Defendant's Motion for Summary Judgment and states as follows:

1. Pursuant to this Court's Order of July 21, 2021, the deadline for the filing of summary judgment motions is October 12, 2021.

2. This Court's Order of September 15, 2021, sets the due date for the filing of Plaintiff's Response to Defendant's Motion for Summary Judgment as October 18, 2021. This schedule provides Plaintiff only six days to respond to Defendant's Motion for Summary Judgment. The Court Order also states that Defendant shall file his Reply in support of his motion on or before November 8, 2021, thereby providing Defendant with 21 days to reply.

3. Although Plaintiff has yet to receive Defendant's Motion for Summary Judgment, a schedule that provides Plaintiff with only four business days to prepare his Response to the Motion is overly burdensome. Additional time to respond is necessary and reasonable.

4. Accordingly, Plaintiff respectfully moves this Court to extend the deadline for filing his Response to Defendant's Motion for Summary Judgment from October 18, 2021 to

November 2, 2021, and to extend the deadline for the filing of Defendant's Reply in support of his Motion for Summary Judgment to November 23, 2021.

5. This Motion is filed out of necessity and not for purposes of delay.

Dated: September 16, 2021

Respectfully submitted,

By: /s/ William D. Heinz
One of the Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

I, William D. Heinz, an attorney, certify that I caused a copy of the foregoing Motion for Extension of Time to File Settlement Demand to be served upon all counsel of record via the ECF Pacer system on September 16, 2021

/s/ William D. Heinz